

REMARKS

Entry of this Amendment and reconsideration are respectfully requested in view of the amendments made to the claims and the remarks made herein.

Claims 1-25 are pending and stand rejected. Claims 1, 2, and 14-18 have been amended.

The examiner has requested that copies of the prior art cited on Page 14 of the specification be provided. Applicants' attorney has requested a copy of the reference and will provide it to the examiner as soon as it is received.

The specification has been objected to for lacking section headings. Applicants respectfully submit that 37 CFR §1.77(b) discloses a *suggested* format for the arrangement of the disclosure. Applicants respectfully submit that the present disclosure follows the suggested format where applicable. Applicants respectfully submit that section headings are suggested but not required, as 37 CFR §1.77(c) clearly states the sections defined in paragraphs (b) (1) through (b) (11) "should" be preceded by a section heading. Applicants respectfully decline at this time to amend the disclosure to include the suggested section headings.

Claims 1-8, 14-18, 21 and 24-25 stand rejected under 35 USC §102(e) as being anticipated by Lu (USP no. 6,658,059).

Applicants respectfully disagree with, and explicitly traverse, the reason for rejecting the claims. However, in the interest of advancing the prosecution of this matter, applicants have elected to amend the independent claims to more clearly state the invention. More specifically, claims 1 and 14, 15, 17 and 18 have been amended to recite that "for a given coefficient the calculation cost is at least partly based on an amount of calculation steps that is required to calculate the given coefficient reduced with an amount of calculations that can be shared with the calculation of other selected coefficients." No new matter has been entered. Support for the amendment may be found in at least claims 2 and 6.

Lu discloses a system for motion transformation by calculating the motion field between two images. The transform coefficients are estimated based upon a previously determined image gradient. Lu discloses multiple methods for handling the selection of coefficients to keep the number of coefficients small while producing good motion

estimates. One method is to use LookUp Tables (LUT) to save time in computing the basis functions at fixed sampling points for faster implementation. In the LUT, the basis functions are pre-calculated since they are repeatedly referenced during each subsequent iteration. Although applicants have amended claim 1 by including subject matter recited contained in claim 2, which was rejected citing the Lu reference, applicants submit that Lu fails to disclose all the elements recited in claim 1, as amended. More specifically, Lu fails to recites the element "for a given coefficient the calculation cost is at least partly based on an amount of calculation steps that is required to calculate the given coefficient reduced with an amount of calculations that can be shared with the calculation of other selected coefficients."

In rejecting claim 2, which depends from claim 1, the Office Action states that "pre-calculated basis functions at fixed sampling points are 'calculations that can be shared with the calculation of other selected coefficients.'" (see page 4 of the instant Office Action). However, the use of LUTs does not disclose all of the subject matter included in the claim. More specifically, the LUTs of Lu fails to disclose that the 'cost is at least ... based on an amount of calculation ... reduced with an amount ... that can be shared." Lu, on the other hand, discloses that the information in the LUTs may be shared but does not disclose the calculation of the coefficients and reduction of the calculation by the shared values, as recited in the claims.

It is well recognized that to constitute a rejection pursuant to 35 USC §102, i.e., anticipation, all material elements recited in a claim must be found in one unit of prior art. For the reason shown, Lu cannot be said to anticipate the present invention, because Lu fails to disclose each and every element recited in claim 1.

Having shown that Lu fails to disclose each and every element recited in the claim, applicants submit that the reason for the rejection of the claim has been overcome and the rejection can no longer be sustained. Applicants respectfully request withdrawal of the rejection and allowance of the claim.

With regard to claims 14, 15, 17 and 18, these claims recite subject matter similar to that recited in claim 1 and have been amended in a manner similar to the amendment made to claim 1. These claims have has been rejected for the same reason used in

rejecting claim 1. Thus, the applicants' remarks made in response to the rejection of claim 1 are also applicable in response to the rejection of the above referred to claims.

In view of the amendments made to the claims, and for the remarks made with regard to the rejection of claim 1, which are repeated, as if in full, herein, in response to the rejection of the claims, applicants submit that the reason for rejecting these claims has been overcome and the rejection can no longer be sustained. Applicants respectfully request withdrawal of the rejection and allowance of the claims.

With regard to claims 2-8, 16, 21, 24 and 25, these claims ultimately depend from the independent claims, which include subject matter not disclosed in, and, hence, allowable over, the cited reference. Accordingly, claims 2-8, 16, 21, 24 and 25 are also allowable by virtue of their dependence from an allowable base claim. Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Claims 9, 19, 22 and 23 stand rejected under 35 USC 103(a) as being unpatentable over Lu in view of Kim (USP no. 6,377,622).

Applicants respectfully disagree with, and explicitly traverse, the reason for rejecting the claims.

Claims 9, 19, 22 and 23 depend from independent claims 1 and 18, respectively, which have been shown to include subject matter not disclosed by Lu. Kim discloses a method and system for coding images using scan interleaving. Kim teaches using horizontal or vertical scanning depending upon a generation frequency of the transitional sample data and the exceptional sample data. However, Kim fails to teach or suggest that the coefficients are based on an amount of calculation steps reduced with an amount of calculation that can be shared, as is recited in the claims.

Neither Lu nor Kim, individually or in combination, teach or suggest all the elements recited in the above referred-to claims. From the teachings of Lu and Kim, even if combined, one would not be motivated to develop a system having all the features recited in the independent claim and, consequently the dependent claims 9, 19, 22 and 23.

Having shown that the combination of Lu and Kim fails to teach or suggest all the elements claimed, applicants submit that the reason for the rejection has been overcome

and the rejection can no longer be sustained. Applicants respectfully request withdrawal of the rejection and allowance of the claim.

Claims 10, 11 and 20 stand rejected under 35 USC 103(a) as being unpatentable over Lu in view of Lengwehasatit (USP no. 6,167,092).

Claims 10, 11 and 20 depend from independent claims 1 and 18, respectively, which have been shown to include subject matter not disclosed by Lu. Lengwehasatit discloses a method and system for variable complexity decoding of motion compensated block based compressed digital video. Lengwehasatit teaches means for selecting a set of coded video data. However, Lengwehasatit fails to teach or suggest that the coefficients are based on an amount of calculation steps reduced with an amount of calculation that can be shared, as is recited in the claims.

Neither Lu nor Lengwehasatit, individually or in combination, teach or suggest all the elements recited in the above referred-to claims. From the teachings of Lu and Lengwehasatit, even if combined, one would not have been motivated to develop a system having all the features recited in the independent claim and consequently dependent claims 10, 11 and 20

Having shown that the combination of Lu and Lengwehasatit fails to teach or suggest all the elements claimed, applicants submit that the reason for the rejection has been overcome and the rejection can no longer be sustained. Applicants respectfully request withdrawal of the rejection and allowance of the claim.

Claims 12 and 13 stand rejected under 35 USC 103(a) as being unpatentable over Lu in view of Conkie (USP no. 6,684,187).

Claims 12 and 13 depend from independent claim 1, which has been shown to include subject matter not disclosed by Lu. Conkie discloses a method and system for improving the response time of a text-to-speech synthesis utilizing triplets comprising a central phoneme and its immediate context. However, Conkie fails to teach or suggest that the coefficients are based on an amount of calculation steps reduced with an amount of calculation that can be shared, as is recited in the claims.

Neither Lu nor Conkie, individually or in combination, teach or suggest all the elements recited in the above referred-to claims. From the teachings of Lu and Conkie, even if combined, one would not have been motivated to develop a system having all the

features recited in the independent claim and, consequently the dependent claims 12 and 13.


Having shown that the combination of Lu and Conkie fails to teach or suggest all the elements claimed, applicants submit that the reason for the rejection has been overcome and the rejection can no longer be sustained. Applicants respectfully request withdrawal of the rejection and allowance of the claim.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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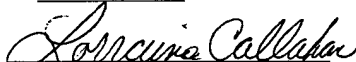
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